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DAVOLOS LAW GROUP

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May 1, 2025

**Via ECF**

Hon. Joseph F. Saporito, Jr., U.S.D.J.  
Max Rosenn U.S. Courthouse  
197 South Main Street  
Wilkes-Barre, PA 18701

Re: Asaro v. Abernathy, 3:23-cv-01576-JFS – Rule 16 Conference  
and Mediation

Dear Judge Saporito:

We represent Plaintiffs, Nancy Asaro and Lori Dring, in the above-referenced matter. I have had the opportunity to speak with my clients and co-counsel concerning mediation. For a multitude of reasons, Plaintiffs are willing to mediate before a certified civil mediator pursuant to Local Rule 16.8 as opposed to a Magistrate Judge or other judicial officer. To be clear, the Plaintiffs are prepared to engage in good faith negotiations and sincerely hope that all parties are as well. My co-counsel, Attorney Howard Rothenberg, like defense counsel, Attorney Geff Blake, is a certified civil mediator pursuant to Local Rule 16.8.2, and strongly endorses the Court Annexed Civil Mediation Program as the appropriate and best means for mediating this matter.

We appreciate the Court's kind courtesies.

Respectfully submitted,

DAVOLOS LAW GROUP

Sincerely,

A handwritten signature in black ink, appearing to read 'Ph A Davolos', written over a horizontal line.

Philip A. Davolos, III, Esquire

cc: counsel of record via ECF.